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Attorneys for non-party Valve Corporation

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

DONALD R. CAMERON, et al.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 4:19-cv-03074-YGR

**DECLARATION OF GAVIN W. SKOK RE:  
NON-PARTY VALVE CORPORATION'S  
RESPONSE TO ORDER RE: PENDING  
MOTIONS TO SEAL (DKT. # 439)**

I, Gavin W. Skok, declare and state as follows in support of Non-Party Valve Corporation's prior requests to seal information and in response to the Court's Order re: Pending Motions to Seal (Dkt. # 439):

1. I am a partner at Fox Rothschild LLP and counsel for non-party Valve Corporation in this action. I am competent to testify, and have personal knowledge of the facts stated below.

2. The Court's Order re: Pending Motions to Seal (Dkt. # 439) (the "Order") requested that any party or non-party that made one or more of the sealing requests listed in the Order "reevaluate their respective motions" in light of the description in the Order of the criteria that the Court intended to apply to those sealing requests.

SKOK DECLARATION RE: VALVE'S RESPONSE TO  
ORDER RE: PENDING MOTIONS TO SEAL  
Case No. 4:19-cv-03074-YGR

3. Three sealing requests made by Valve were listed in the Order: Dkt. # 338, Dkt. # 402, and Dkt. # 426-427. Valve re-evaluated these requests in light of the Order.

4. Based on further review in light of the criteria in the Order, Valve withdraws its request to seal Paragraph 306 and footnote 687 in the Expert Report and Declaration of Richard Schmalensee (Dkt. # 373-5). Valve made this withdrawn request in Dkt. # 402 in Paragraph 5 (at 3:26-4:2) and discussed in Paragraph 15.

5. Valve maintains all of its other sealing requests made in Dkt. # 338, Dkt. # 402 and Dkt. # 426-427. Valve's review confirmed that, consistent with the Order, all of the remaining information Valve seeks to seal is: (i) narrowly-tailored financial information or information bearing on current competitive issues, (ii) from January 1, 2019 or later, and/or (iii) was previously sealed in the Epic Games/Apple action.

6. Valve understands Apple is submitting an omnibus filing with a master list of all sealing requests by parties and non-parties contained in the documents listed in the Order. For ease of reference, the specific information Valve seeks to seal is listed at:

- Dkt. # 338 at Paragraph 5;
- Dkt. # 402 at Paragraph 5.

7. Valve's filings at Dkt. ## 426 and 427 submitted proposed revised redacted versions of the three expert reports addressed by Valve in Dkt. # 402 and sought to file these revised redacted versions under seal, but did not request sealing of any additional information different from or beyond what Valve previously requested in Dkt. # 338 and Dkt. # 402.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on October 31, 2021 at Sammamish, Washington.

s/Gavin W. Skok

Gavin W. Skok